

# **LOUISIANA STATE CONFERENCE NAACP**

## **Exhibit C**

### **D.L. Declaration**

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
ALEXANDRIA DIVISION**

Case No. 69-cv-14430

UNITED STATES OF AMERICA,

Plaintiff,

v.

CATAHOULA PARISH SCHOOL BOARD,  
ET AL,

Defendants.

**DECLARATION OF D.L.**

I, D.L., do hereby declare as follows:

1. I make this Declaration based on my own personal knowledge and am competent to testify concerning the matters set forth below.
2. I am 15 years old and currently a student at Block High School in the 10th grade.
3. I have attended schools in the Catahoula Parish school district for all my years of schooling, and previously attended Jonesville Junior High and Jonesville Elementary School.
4. The conditions at my school are a disappointment. The walls are stained, there are rusted pipes and spots of yellow paint on the walls. Desks and chairs are also run down. When they break, the students try to fix them but some broken items remain in the classrooms.
5. The bathrooms are in poor condition and the urinals leak when flushed. There is rarely any soap in the bathrooms and hardly any napkins. Some of the ceiling tiles in the

bathroom have fallen due to water damage from leaking pipes that continue to drip into the bathroom. I reported to a janitor and then the principal that the urinals were leaking around the end of August 2018. To date, the urinals have not been repaired and continue to leak.

6. When I was in eighth grade, classes stopped being held in Building A due to unsanitary conditions. There was a strong stench coming from the vents in the building, which caused multiple students to get sick.

7. The following year, Building B was shut down due to mold throughout the building including the library. The floor in the second floor hallway was rotting out and would sink in as you walked on it. Building B was the only building with a science lab so students at Block High currently do not have a science lab.

8. The only usable building in Block High School is Building C, which caused crowding in the beginning of the school year due to all the students in one building.

9. At the beginning of this school year, my football coach was told he had to teach U.S. History. When I was in 8th grade, my gym teacher taught social studies for almost the entire school year.

10. We do not have textbooks in any of our classes except for Agricultural Science. Each class has a set of Chromebooks, and we learn through websites such as YouTube, Louisiana Believes, [www.ixl.com](http://www.ixl.com), and Edgenuity.

11. To my knowledge, Block High School has not offered its students an opportunity to go on a field trip for the past two years.

12. There have been minimal improvements to Block High in the past few weeks: The moldy carpets in Building C were removed from the hallway, and the walls were painted black in the bathrooms. However, there is still mold throughout the building and the urinals and

pipes in the bathroom still leak. Block High School hired a new U.S. history teacher yesterday, March 4, 2019, and hired a new English teacher two weeks ago.

13. Many students transferred out of Block High School, mostly to Harrisonburg High School. This school year, about twelve students left Block High School. One of those students was my friend who left because he was concerned about getting the education he needed to go to college.

14. When there was a proposal last year to consolidate all of the high schools in Catahoula Parish, there was outcry from teachers, students, and parents at Harrisonburg. Students at Block High School were called animals, and teachers from Harrisonburg referred to us as “bad kids.”

15. When I graduate, I hope to become a mechanic, but I do not feel like this school is adequately preparing me for that goal.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: \_\_\_\_3/4/19\_\_\_\_

DL  
D.L.

### **PARENTAL CONSENT AND DECLARATION**

I, Joyce Crooks, do hereby state that I am the natural parent and/or legal guardian of D.L. and declare as follows:

1. I am entitled to the full control and custody of D.L. and am responsible for his care, custody and control.
2. I acknowledge that D.L. voluntarily elects to execute this declaration, and I consent to his execution of same.
3. I also declare that I am aware of and/or have witnessed the circumstances described by D.L. in this declaration.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: 3-4-2019

Signature: \_\_\_\_\_

Name: Joyce Crooks

